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7 Attorney for Timothy Douglas Martino

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11

12 Plaintiff,

13 v.

14 TIMOTHY DOUGLAS MARTINO,
15

Defendant.

Case No. 2:21-cr-00213-APG-NJK-1

**STIPULATION TO CONTINUE
REVOCATION HEARING**
(First Request)

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
18 United States Attorney, and Jim W. Fang, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Katherine A.
20 Tanaka, Assistant Federal Public Defender, counsel for Timothy Douglas Martino, that the
21 Revocation Hearing currently scheduled on September 28, 2022, at 10:30 a.m., be vacated and
22 continued to a date and time convenient to the Court, but no sooner than one-hundred (100)
23 days.

24 This Stipulation is entered into for the following reasons:

25 1. The petition alleges conduct constituting a new law violation. There is an open
26 state criminal case based on the alleged new law violation. The next state court date is
December 20, 2022. At that point, the parties should have an idea of how the state case will

1 proceed. The parties have agreed that, to reach a resolution in the instant case, a continuance
2 is necessary to determine how the state case will proceed.

3 2. The defendant is not in custody and agrees with the need for the continuance.

4 3. The parties agree to the continuance.

5 This is the first request for a continuance of the revocation hearing.

6 DATED this 20th day of September 2022.

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8 RENE L. VALLADARES
Federal Public Defender

JASON M. FRIERSON
United States Attorney

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10 By /s/ Katherine A. Tanaka

By /s/ Jim W. Fang

11 KATHERINE A. TANAKA
12 Assistant Federal Public Defender

JIM W. FANG
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 TIMOTHY DOUGLAS MARTINO,

7 Defendant.
8

Case No. 2:21-cr-00213-APG-NJK-1

ORDER

9
10 IT IS THEREFORE ORDERED that the revocation hearing currently scheduled
11 for September 28, 2022, at 10:30 a.m., be vacated and continued to January 10, 2023 at the
12 hour of 10:00 a.m. in LV Courtroom 6C; or to a time and date convenient to the court.

13 DATED this 21st day of September 2022.

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16 UNITED STATES DISTRICT JUDGE
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